

EXHIBIT A

February 19, 2025 E-mail

From: [Demmy, John D.](#)
To: [Peter C. Hughes \(phughes@dilworthlaw.com\)](#); [aaaronson@dilworthlaw.com](#)
Subject: CarePoint / Access
Date: Wednesday, February 19, 2025 5:34:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Pete / Anne:

This is in follow up to my discussions with Anne prior to last week's hearing after learning of Debtors' intent to reject the Access contracts, which were to the effect that Debtors and Access should as soon as possible discuss an orderly disposition of the documents and information being stored by Access for the Debtors (which includes patient care information). As it has consistently stated throughout this process, Access submits there are retention obligations with respect to the patient care information being stored. Again, what are Debtors' intentions with respect to such material? Access' position is that notwithstanding the filing of the motion to reject yesterday, Access' administrative claim(s) will continue to accrue until disposition and that the manner of disposition – destruction, transfer or otherwise – may also cause the incurrence of additional administrative expense claims.

Access understands that pursuant to the proposed plan, if confirmed as presently constituted, Bayonne Medical Center will be transferred to HRH and that HRH will become the manager/operator of Christ Hospital. Will Debtors be seeking transfer of documents and information relating to Bayonne Medical Center and Christ Hospital to HRH?

At bottom, Access does not believe that an "abandonment" of this material (i.e., not taking appropriate steps to destroy unneeded material and/or transferring material that should be retained) is appropriate under the circumstances; and that Debtors should in good faith work with Access in connection with a proper disposition of all documents and information currently being stored.

Please advise.



John D. Demmy

Partner

[\(302\) 421-6848](#)

john.demmy@saul.com

 [Read my bio >](#)



1201 North Market Street, Suite 2300
Wilmington, DE 19801